

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE WINCHESTER DIVISION**

Ashton Hughes,)	
Joshua VanDusen,)	
Shannon Helmers, and)	
Charles Dodson,)	
)	
Plaintiffs,)	No. 4:19-CV-00028-CLC-SKL
v.)	
)	JURY DEMAND
Denise Jackson and,)	
RVshare, LLC.,)	
)	
Defendants.)	
)	

RULE 26(a) INITIAL DISCLOSURES OF DEFENDANT RVSHARE, LLC

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant RVshare, LLC (hereinafter “RVshare”) submits these Initial Disclosures as follows:

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

RVshare believes the following are among the individuals likely to have discoverable information based on their understanding of the claims as currently pled. RVshare reserves the right to supplement this list as discovery progresses:

1. Plaintiff Ashton Hughes may be contacted through her counsel. She has information regarding agreements and communications between herself and the Defendants, the alleged incident, her injuries, and her damages as alleged in the Complaint.
2. Plaintiff Joshua VanDusen may be contacted through his counsel. He has information

- regarding the alleged incident, his injuries, and his damages as alleged in the Complaint.
3. Plaintiff Shannon Helmers may be contacted through her counsel. She has information regarding the alleged incident, her injuries, and her damages as alleged in the Complaint.
 4. Plaintiff Charles Dodson may be contacted through his counsel. He has information regarding the alleged incident, his injuries, and his damages as alleged in the Complaint.
 5. Defendant Denise Jackson may be contacted through her counsel. Upon information and belief, she may have information regarding the condition of the vehicle allegedly involved in the incident. She may also have information regarding agreements and communications between herself, Ashton Hughes, and RVshare.
 6. Tom Klenotic, VP of Finance at RVshare, may be contacted through counsel for RVshare. He has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
 7. Tara Bellman, former VP of Customer Solutions at RVshare, may be contacted through counsel for RVshare. She has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident. Her last known contact information is 766 Craig Drive, Tallmadge, OH 44278.
 8. Josh Clark, former Customer Solutions Team Lead at RVshare, may be contacted through counsel for RVshare. He has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident. His last known contact information is 5695 Canterbury Drive, Akron, OH 44319.
 9. Tori Tauscher, Customer Solutions Team Lead at RVshare, may be contacted through

- counsel for RVshare. She has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
10. Megan Headrick, Customer Solutions Team Lead at RVshare, may be contacted through counsel for RVshare. She has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
 11. Rachel Martinez, Customer Solutions Associate at RVshare, may be contacted through counsel for RVshare. She has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
 12. Krista Fuller, Customer Solutions Associate at RVshare, may be contacted through counsel for RVshare. She has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
 13. Madeline Tauscher, Customer Solutions Associate at RVshare, may be contacted through counsel for RVshare. She has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
 14. Matt Jenney, Customer Solutions Associate at RVshare, may be contacted through counsel for RVshare. He has knowledge applicable to the services provided by RVshare with regard to the vehicle involved in the incident.
 15. Plaintiff Ashton Hughes' sister and mother are believed to have information regarding the vehicle allegedly involved in the incident, and may have knowledge of Ashton Hughes' alleged injuries and damages in this case. Addresses and contact information are unknown at present.
 16. Craig Bennett is Defendant Denise Jackson's cousin. He may have information about the condition of the vehicle involved in the incident. His address and contact information are unknown at present.

17. Personnel of National Indoor RV Center may have information about the condition and maintenance of the vehicle involved in the incident. The exact individuals are unknown. Upon information and belief, National Indoor RV Center can be contacted at 1350 Hurricane Shoals Rd. NE, Lawrenceville, GA 30043, (770) 979-4051.
18. Upon information and belief an unknown number of individuals were present at the scene of the incident, the 2018 Bonnaroo Festival. RVshare believes that some of those individuals may have information about the facts and circumstances alleged in the Complaint.
19. Mark and Angelique Stacey were previous renters of the vehicle involved in the incident. Upon information and belief, they may have information regarding the condition of the vehicle involved in the incident when they rented it. Their last known address is 1023 Bench Mark Drive, McDonough, GA 30252-6650. Mark Stacey's last known phone number is (770) 912-8136. Angelique Stacey's last known phone number is (404) 702-9543.
20. William and Meggie Anne Keogh were previous renters of the vehicle involved in the incident. Upon information and belief, they may have information regarding the condition of the vehicle involved in the incident when they rented it. Their last known addresses are 1803 Westwind Court, League City, TX 77573 and 5856 Fornof Road, Columbus, GA 31909. William Keogh's last known phone number is (720) 232-0038.
21. The Plaintiffs' non-party family members, friends, and medical providers specifically listed in Plaintiffs' initial disclosures and discovery responses are believed to have knowledge of Plaintiffs' alleged injuries and damages in this case and other information about the circumstances alleged in the Complaint. Addresses and contact information are unknown at present.

(ii) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

1. Photographs depicting the condition of the vehicle involved in the incident after the alleged incident occurred are currently in the possession of counsel for RVshare.
2. A copy of the RVshare Terms of Service active at the time of the events alleged in the Complaint is currently in the possession of counsel for RVshare.
3. A copy of the Rental Agreement signed by Ashton Hughes is currently in the possession of counsel for RVshare.
4. A copy of the 2018 Bonnaroo Festival site map is currently in the possession of counsel for RVshare.
5. Copies of screenshots depicting the reservation information of the prior two rentals are currently in the possession of counsel for RVshare.
6. RVshare may rely on Plaintiff's medical records specifically listed in Plaintiff's initial disclosures and discovery responses (unknown to RVshare at this time), or as become available to RVshare through other discovery during this action.

(iii) A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE:

RVshare is not asserting a claim for damages at this time.

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

A copy of the applicable insurance policy and addenda are available for inspection and copying upon request of any party.

Respectfully submitted this 5th day of December, 2019.

COPELAND, STAIR, KINGMA & LOVELL, LLP

/s/ G. Graham Thompson

ANGELA CIRINA KOPET, BPR 017921

G. GRAHAM THOMPSON, BPR 034467

920 McCallie Avenue

Chattanooga, TN 37403

Phone: 423-777-4693

Fax: 423-648-2283

CERTIFICATE OF SERVICE

This is to certify the foregoing pleading was filed electronically and that the notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

This 5th day of December, 2019

COPELAND, STAIR, KINGMA & LOVELL, LLP

/s/ G. Graham Thompson